REMARKS

In the Office Action dated October 3, 2003, the Examiner rejected claims 1-39 under 35 U.S.C. § 102(e) as being unpatentable Bowman-Amuah (U.S. Patent No. 6,601,234).

Based on the following arguments, Applicants respectfully traverse the rejection of claims 1-39 under 35 U.S.C. § 102(e).

I.   The Rejection of Claims 1-5

Applicants respectfully traverse the rejection of claims 1-5 under 35 U.S.C. § 102(e) in view of Bowman-Amuah because the reference does not teach each and every recitation of these claims.

Bowman-Amuah discloses a business logic services system that uses business components and objects to facilitate development and execution of business applications. The reference describes various levels of development, including the development of business components based on the requirements of a business and the development of processes that facilitate the execution of the business applications. In one aspect, Bowman-Amuah uses an attribute dictionary to storing attribute values for the business objects used by the developed business application.

The Examiner asserts that the attribute dictionary is an ontology providing uniform definitions for the concepts and relationships between concepts used in a plurality of business models. See Office Action, page 2, paragraph 4. Applicants respectfully disagree. The attribute dictionary merely stores values for attributes used

by entities for processing business objects. The business objects may retrieve or set the attribute values by invoking generic methods. *See Bowman-Amuah, col. 200, lines 5-15 and col. 201, lines 1-40).* In some instances, Bowman-Amuah may allow the system to broadcast updates of attribute values to software entities that require or request such notifications. Although these processes may allow Bowman-Amuah to define consistent attribute values, they do not teach or even suggest an ontology that is in communication with a plurality of models and provides uniform definitions for concepts and their relationships used in these models, as recited in claim 1. Indeed, the reference does not mention the use of ontologies in developing or implementing its business logic services. Further, because the attribute values are data values used by business objects, they do not indicative of definitions of concepts or relationships between concepts used by a business domain.

Because Bowman-Amuah does not teach each and every recitation of claim 1, the reference cannot anticipate this claim. Accordingly, Applicants request that the rejection of claim 1 under 35 U.S.C. 102(e) be withdrawn and the claim allowed.

Claims 2-5 depend from claim 1. As explained, claim 1 is distinguishable from Bowman-Amuah. Accordingly, claims 2-5 are also distinguishable from this reference for at least the same reasons set forth in connection with claim 1, and Applicants request that the rejection of claims 2-5 be withdrawn and the claims allowed.

II. The Rejection of Claims 6-12

Applicants respectfully traverse the rejection of claims 6-12 under

35 U.S.C. § 102(e) in view of Bowman-Amuah because the reference does not teach

each and every recitation of these claims.

As explained, Bowman-Amuah discloses a business logic services system that

describes various software components associated with business applications used to

perform one or more services for a target business. The reference, however, fails to

teach a method for executing an interaction flow model, as recited in claim 6. In an

attempt to show anticipation, the Examiner points to significantly different portions of the

reference. The different portions do not individually or collectively teach the processes

recited in claim 6.

For example, the event described in column 252, lines 66-67 (cited by the

Examiner) is associated with a startup event of an activity during a process for

assigning a view to an activity. This process is associated with collaborations and

allows users to view business activities, such as the creation of objects. See Bowman-

Amuah, col. 253, lines 1-32. In an attempt to show a teaching of categorizing the event,

the Examiner cites to column 55, lines 53-55 of Bowman-Amuah. This portion of the

reference merely describes a catalog server that creates, manages, and updates an

online catalog of documents residing on corporate intranets and internets. At most, this

showing merely describes Bowman-Amuah's ability to catalog documents. The

reference does not teach or even suggest categorizing events. Moreover, the "event"

describe in column 252 of Bowman-Amuah has no relationship with the catalog server

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described in column 55. This disconnect between what the Examiner deems is an "event" and "categorizing" the events is fatal to the Examiner's position that Bowman-Amuah anticipates the recitations of claim 6.

Similar discrepancies are also found in the Examiner's assertions associated with the remaining recitations of claim 6. For instance, the Examiner asserts that Bowman-Amuah teaches identifying a situation that matches the "categorized received event" in column 54, lines 64-65. *See Office Action, paragraph 9.* On its face, this assertion is inconsistent with the structure of Bowman-Amuah's disclosure. That is, it is unclear how the disclosure described in column 54 of Bowman-Amuah can teach claim recitations that have a relationship with elements that the Examiner asserts is found in subsequent portions of the reference (i.e., columns 55 and 252). Moreover, the attribute search function described in column 54 (cited by the Examiner) merely describes a functionality associated with "most document management products," namely processes for searching and returning documents that match a search criteria. *See* Bowman-Amuah, *col. 54, lines 59-64.* This search function has no relationship or connection with a categorized event, as recited in claim 6. Indeed, the search function does not even have a relationship or connection with the "event" and "catalog server" taught by Bowman-Amuah, from which the Examiner relies upon to show anticipation of the receiving and categorizing steps of claim 6.

Further, the Examiner's assertions that Bowman-Amuah teaches executing one or more tasks for "the situation," as recited in claim 6 is wrong. In an attempt to show anticipation of this recitation of claim 6, the Examiner points to Remote Procedure Call (RPC) mechanisms described by Bowman-Amuah. It is nonsensical to assert that the

well known techniques of RPCs alone teaches a process executing tasks for the identified situation, as recited in the claim. In fact, Bowman-Amuah merely describes the basic functions of RPCs in the portion cited by the Examiner, and these functions have no relationship or connection with the "events" described in column 252, the "catalog server" described in column 55, or the attribute search functions described in column 54 of Bowman-Amuah.

Because Bowman-Amuah does not teach each and every recitation of claim 6, the reference cannot anticipate this claim. Accordingly, Applicants request that the rejection of claim 6 under 35 U.S.C. 102(e) be withdrawn and the claim allowed.

Claims 7-12 depend from claim 6. As explained, claim 6 is distinguishable from Bowman-Amuah. Accordingly, claims 7-12 are also distinguishable from this reference for at least the same reasons set forth in connection with claim 6. Further, the reference fails to teach the recitations of these claims and Applicants request that the rejection of claims 7-12 be withdrawn and the claims allowed.

III. The Rejection of Claims 13-28

Applicants respectfully traverse the rejection of claims 13-28 under 35 U.S.C. § 102(e) in view of Bowman-Amuah because the reference does not teach each and every recitation of these claims and the Examiner has not properly met his burden in showing where the reference teaches the recitations of claims 13-28.

Applicants traverse the Examiner's rejection of claims 13-28 because the Examiner has cited to portions of Bowman-Amuah that do not correspond to the quoted description set forth in the Office Action. *See Office Action, page 7, paragraph 17 and*

corresponding citations to <u>Bowman-Amuah</u>. For example, column 2 does not teach or mention "a knowledge management system," a "distributed information service," or "problem statements as sets of facts," as asserted by the Examiner in the Office Action. *See Id.* Further, column 6, does not disclose a "knowledge agent later," also quoted by the Examiner. Indeed, a majority of the citations referred to by the Examiner in the Office Action do not correspond to the quoted statements of <u>Bowman-Amuah</u> set forth in the Office Action. Due to the complexity and size of the disclosure of <u>Bowman-Amuah</u>, Applicants respectfully request that the Examiner properly cite to the appropriate portions of the reference to support the assertions set forth in the Office Action. Without the Examiner's compliance, Applicants are not afforded a reasonable opportunity to address the Examiner's position with respect to the alleged teachings of <u>Bowman-Amuah</u>.

For example, the reference does not teach a "knowledge management system" as cited by the Examiner. Indeed, Applicants cannot find this system disclosed anywhere in the reference. The same problem exists for the Examiner's reference to a knowledge agent layer," a "knowledge managements system that supports inquires of distributed knowledge resources," and a "problem statements as sets of facts," all quoted and referenced by the Examiner in the Office Action on page 7.[1]

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[1] Applicants' representative performed a text search of U.S. Patent No. 6,601,234 via the USPTO's Full Text and Image Database (www.uspto.gov) in an attempt to locate the portions of <u>Bowman-Amuah</u> cited by the Examiner. Based on the text search, Applicants' representative could not locate any of the quoted statements cited by the Examiner in the Office Action.

Accordingly, the rejection of claims 13-28 are improper because the Examiner has not properly demonstrated that <u>Bowman-Amuah</u> teaches the recitations of these claims.

Notwithstanding the improperness of the Examiner's rejection of claims 13-28 as set forth in the Office Action, Applicants submit that <u>Bowman-Amuah</u> does not teach or suggest the recitations of claims 13-28. And, because the reference fails to teach each and every recitation of these claims, Applicants request that the rejection of these claims under 35 U.S.C. § 102(e) be withdrawn and the claims allowed.

IV.   The Rejection of Claims 29-35

Applicants respectfully traverse the rejection of claims 29-35 under 35 U.S.C. § 102(e) in view of <u>Bowman-Amuah</u> because the reference does not teach each and every recitation of these claims and the Examiner has not properly met his burden in showing where the reference teaches the recitations of claims 29-35.

Applicants traverse the Examiner's rejection of claims 29-35 because the Examiner has cited to portions of <u>Bowman-Amuah</u> that do not correspond to the quoted description set forth in the Office Action. *See Office Action, page 13, paragraph 30 and corresponding citations to <u>Bowman-Amuah</u>.* As explained above in connection with claims 13-28, *Bowman-Amuah* does not include the quoted statements as indicated and referenced by the Examiner. For example, the reference does not disclose a "knowledge agent layer" as referred to by the Examiner in the Office Action. *See Id.* Accordingly, the rejection of claims 29-35 are improper because the Examiner has not properly demonstrated that <u>Bowman-Amuah</u> teaches the recitations of these claims.

Further, Applicants submit that <u>Bowman-Amuah</u> does not teach the recitations of claims 29-35. For example, the reference fails to disclose a reasoning engine configured to derive a set of conclusions using a set of premises and to execute actions that are attached to the set of conclusions, wherein a plurality of models encode the set of premises, as recited in claim 29. In fact, assuming the reference discloses a "knowledge management system that supports inquires of distributed knowledge resource," whereby the "inquires may be in the form of questions of problem statements presented by a user," as the Examiner asserts and in which Applicants do not concede, such inquires are not models or premises, as recited in claim 29. Moreover, providing an interface for knowledge modules, as asserted by the Examiner, does not show a knowledge manager being a repository of a plurality of models each defining situations that occur in decision making to achieve a goal state, as recited in claim 29.

Additionally, <u>Bowman-Amuah</u> does not teach an ontology to provide consistency between the models, as alleged by the Examiner. Indeed, the Examiner does not address an ontology, but instead merely states that <u>Bowman-Amuah</u> teaches a "knowledge agent layer provides the direct interface and interaction mechanism for the knowledge modules within the knowledge module layer." This representation has no relation to an ontology, and does not teach or suggest providing consistency between a plurality of models, as recited in claim 29.

Because <u>Bowman-Amuah</u> does not teach each and every recitation of claim 29, and the Examiner has not provided sufficient evidence of such teachings in the Office Action, Applicants request that the rejection of this claim under 35 U.S.C. § 102(e) be withdrawn and the claim allowed. Further, because claims 30-35 depend from claim 29,

Applicants request that the rejection of these claims also be withdrawn and the claims allowed, for at least the same reasons set forth in connection with base claim 29.

V.   The Rejection of Claims 36-39

Claim 36 includes recitations similar to those of claim 6. As explained, claim 6 is distinguishable from Bowman-Amuah. Accordingly, claim 35 is also distinguishable from this reference for at least the same reasons set forth in connection with claim 6, and Applicants request that the rejection of this claim under 35 U.S.C. § 102(e) be withdrawn and the claim allowed.

Claims 37-39 depend from claim 36. As explained, claim 36 is distinguishable from Bowman-Amuah. Accordingly, claims 37-39 are also distinguishable from this reference for at least the same reasons set forth in connection with claim 36. Further, the reference fails to teach the recitations of these claims and Applicants request that the rejection of claims 37-39 be withdrawn and the claims allowed.

Further, Applicants respectfully traverse the rejection of claims 37-39 under 35 U.S.C. § 102(e) in view of Bowman-Amuah because the reference does not teach each and every recitation of this claim and the Examiner has not properly met his burden in showing where the reference teaches the recitations of claims 37-39.

For example, Applicants traverse the Examiner's rejection of claim 39 because the Examiner has cited to portions of Bowman-Amuah that do not correspond to the quoted description set forth in the Office Action. See Office Action, page 16, paragraph 39 and corresponding citations to Bowman-Amuah. As explained above in connection with claims 13-35, Bowman-Amuah does not include the quoted statements as

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indicated and referenced by the Examiner. For example, the reference does not disclose a "mapping" that may be "used by the meta agent to optimize solutions," as referred to by the Examiner in the Office Action.[2] *See Id.* Accordingly, the rejection of claim 39 is improper because the Examiner has not properly demonstrated that Bowman-Amuah teaches the recitations of these claims.

Additionally, assuming Bowman-Amuah does disclose "a knowledge management system that supports inquires of distributed knowledge resources," as alleged by the Examiner, and in which Applicants do not concede, such showing does not teach an interpretation of a model that includes one or an infer action, a search with constraints action, an interact action, an optimize action, and a decide action, as recited in claim 39. The alleged inquires of distributed knowledge resources, as stated by the Examiner in the Office Action, does not provide sufficient evidence of the actions recited in claim 39.

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[2] Applicants' representative performed a text search of U.S. Patent No. 6,601,234 via the USPTO's Full Text and Image Database (www.uspto.gov) in an attempt to locate the portions of Bowman-Amuah cited by the Examiner. For example, Applicants' representative search for the term "meta agent" as quoted by the Examiner. Based on the text search, Applicants' representative could not locate any of the quoted statements, including "meta agent" in the reference, as cited by the Examiner in the Office Action.

VI.   Conclusion

In view of the foregoing amendments and remarks, Applicants respectfully request the reconsideration and reexamination of this application and the timely allowance of claims 1-39.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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Dated: April 5, 2004   By: _____

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